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**From:** Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]  
**Sent:** 11/15/2019 1:46:30 AM  
**To:** jrose@bluecrestenergy.com  
**CC:** Adam Saaid [adam.saaid@alaska.gov]  
**Subject:** Records Request, EPA Air Compliance Inspection of BlueCrest Alaska Operating LLC, Cosmopolitan Project

Jacki Rose  
BlueCrest Alaska Operating LLC

Hello Jacki. I'm sending this email to request records as part of the joint EPA/State of Alaska air compliance inspection yesterday, November 13, 2019 at the Cosmopolitan Project. During the inspection ADEC inspector Adam Saaid and I toured the facility pad and discussed operations in general. My part of the inspection focused on compliance with federal air rules under the Clean Air. Thank you for your assistance by escorting us and answering questions during the inspection.

I've organized my request into groups for the federal air rules indicated below. I would appreciate receiving these records by Friday, November 29th. Please let me know if you have any questions about this request or need more time to gather records.

Records Request. Please send me the following records:

**New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart OOOOa—Standards for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.**

1. A copy of the current Fugitive Emission Monitoring Plan for the Cosmopolitan Project facility. This plan is required by §60.5397a(b).
2. Records of fugitive leak inspections at the Cosmopolitan Project facility in calendar year 2019. (See §60.5420a(c)(15))
  - a. For all leaks identified during your inspections, provide records of:
    - i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified,
    - ii. Digital photos and/or FLIR infra-red videos of leaking components showing GPS coordinates,
    - iii. Instrument readings of leaking components (when using Method 21),
    - iv. Tag identification numbers, or photos of tags put onto leaking components that were not repaired during the monitoring survey,
    - v. Work orders related to repairing leaks,
    - vi. Follow up inspection records for all leaking components which were put on a delay of repair schedule and then later repaired (and verified to no longer be leaking).
  - b. In the 2019 Annual Report (submitted to EPA R10 on 10/29/19), the report states that one (1) leak was identified at during a survey on 5/28/2019, but not successfully repaired during the next scheduled shutdown in September 2019, but then subsequently repaired on 10/28/19. Please provide a description of the initial repair attempt and why it did not work. How was the repair eventually performed successfully?
  - c. The 2019 Annual Report does not include any information regarding well completion operations. (§60.5420a(b)(2)) Were any performed in the time period covered by the 2019 report? If so, please provide the relevant records described in §60.5420(c)(1).

3. What is the API gravity of crude oil produced at the facility? (§60.5430a)

**NSPS, 40 CFR Part 60, Subpart IIII—Standards for Stationary Compression Ignition Internal Combustion Engines.**

1. A copy of Initial Notifications submitted to EPA Region 10 for all compression ignition engines subject to Subpart IIII owned or operated by the Cosmopolitan Project facility. (§60.4214(a)(1))
2. Maintenance records, for maintenance conducted from 1/1/2018 through the present time, on all compression ignition engines subject to Subpart IIII owned or operated by the Cosmopolitan Project facility. (§60.4214(a)(2))

**NSPS, 40 CFR Part 60, Subpart JJJJ—Standards for Stationary Spark Ignition Internal Combustion Engines.**

1. A copy of Initial Notifications submitted to EPA Region 10 for all spark ignition engines subject to Subpart JJJJ owned or operated by the Cosmopolitan Project facility. (§60.4245(a)(1))
2. Maintenance records, for maintenance conducted from 1/1/2018 through the present time, on all spark ignition engines subject to Subpart JJJJ owned or operated by the Cosmopolitan Project facility. (§60.4245(a)(2))

**National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart JJJJJ—Standards for Industrial, Commercial, and Institutional Boilers Area Sources**

1. A copy of Initial Notifications submitted to EPA Region 10 for all boilers subject to Subpart JJJJJ owned or operated by the Cosmopolitan Project facility. (§63.11225(a)(1) and (2))
2. Records of tune-ups performed on boilers subject to Subpart JJJJJ. (§§63.11223(a) and 63.11225(c))

**NESHAP, 40 CFR Part 63, Subpart HH—Standards for Oil and Natural Gas Production Facilities**

1. A copy of Initial Notification submitted to EPA Region 10 for the Cosmopolitan Project facility. (§63.775(a)(1) and (2))
2. For an area source of Hazardous Air Pollutants (HAP), the affected source includes each triethylene glycol (TEG) dehydration unit. (§63.760(b)(2)) Please provide a description of the manufacturer, date of construction and capacity of the TEG dehydration unit at your facility.
3. Provide the basis for which the Cosmopolitan Project facility determined that it is an area source of HAP, and not a major source of HAP. (§63.760(a)(1))
4. If the Cosmopolitan Project facility determined it is not a major source but has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP, please provide your annual updates for your major source determinations for each year since 1/1/2017. (§63.760(c))

I would appreciate receiving these records by Friday, August 16. Thank you for your assistance with this request.

Sincerely,

John Pavitt, Air Compliance Inspector  
Air and Toxics Enforcement Section  
U.S. EPA Region 10  
Alaska Operations Office  
Anchorage, AK  
Phone: (907) 271-3688